

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 1:25-CR-0257
	§	
JAMES LAEL JENSEN, ET AL	§	

**UNOPPOSED MOTION TO CONTINUE
SCHEDULING ORDER AND CERTIFY CASE AS
COMPLEX**

The United States of America through Nicholas J. Ganeji, United States Attorney, Laura Garcia and James Sturgis, Assistant United States Attorneys, respectfully moves that the Court designate this case as complex pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii) to continue the current motions and trial schedule, including the trial date.

Under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.* (“Act”), a defendant’s trial must generally commence within 70 days of their indictment or first appearance before a judicial officer, whichever is later. 18 U.S.C. § 3161(c)(1). The Act, however, excludes certain periods from this computation, including continuances granted for complex cases.

The Court may toll the 70-day period by granting a continuance based on the Court’s finding that the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a speedy trial. *Id.* at §

3161(h)(7)(A).

In addition to the nature of the case and the number of defendants, courts have also considered the volume of discovery and investigative materials in designating cases as complex. *See e.g., United States v. Edelkind*, 525 F.3d 388, 397 (5th Cir. 2008).

The United States respectfully requests that the case be certified as complex. The Indictment in this case currently involves four defendants charged with various money laundering and smuggling of goods charges. The indictment spans a three-year time period and the discovery in this particular case is voluminous. The government requests additional time to review and produce discovery. Given the potential volume of discovery and the extent of the investigation, the parties cannot be ready for the currently-scheduled pretrial and trial deadlines. *See* 8 U.S.C. § 3161(h)(7)(B)(i) and (ii).

The government requests, and the defense is unopposed, to a continuance of all deadlines of no less than 90 days. As well, defendants in the case are currently on different scheduling orders, the United States respectfully requests that the Court schedule all defendants for a status conference on or about August 15, 2025, which is approximately 90 days from the date of this motion to coordinate and discuss a scheduling order with the Court.

Based on the foregoing, the government requests the Court grant its

motion to certify this case as complex and continue all deadlines as set forth above. This Court should find specifically that the ends of justice served by taking this action “outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(g)(7)(A).

Respectfully submitted,
NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

/s/ Laura Garcia
Laura Garcia
Assistant United States Attorney

CERTIFICATE OF CONFERENCE

I hereby certify defense counsel for each defendant stated they were unopposed to the foregoing motion on this 15th day of May, 2025.

/s/Laura Garcia
Laura Garcia
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for all defendants in accordance with the Federal Rules of Criminal Procedure on this 15th day of May, 2025.

/s/Laura Garcia
Laura Garcia
Assistant United States Attorney